

### **Remarks**

All the claims were rejected as being anticipated by Reed. Claim 1 has been amended to specify that the shroud has a first end and a second end with the second located remote from the tubing hanger and to specify that the capillary tubing extends beyond the second end of the shroud such that the capillary tubing connector is located beyond the second end. In short, Reed does not disclose or suggest the presently claimed structure.

As an initial matter, it appears that the Office Action misidentifies the control conduit by referring to reference numeral 26 (which Reed describes as a flange). It is believed that the Action meant to refer to reference numeral 268 since with respect to claim 4, the Action states that "Reed shows each connector is in the form of a ferrule nut 266". Connector 266, however, connects portion 268 with portion 262, neither of which relates to flange 26. If Applicant's understanding is incorrect, then it is requested that Action more particularly point out the elements in Reed, which it is contended are the equivalent to the claimed elements.

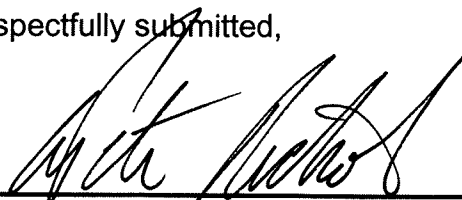
Assuming Applicant's understanding is correct, then it is clear that Reed does not teach or suggest the presently claimed structure. In fact, Reed teaches away from the present structure by providing a structure in which any connection that occurs is within the shroud and not exterior of the shroud as required by the claims. Because Reed does not teach or suggest the claimed structure, Reed cannot and does not anticipate or render obvious the present structure.

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Response to Aug. 23, 2007 Office Action

It is believed that the present claims are patentable and notification to that effect is requested. The undersigned attorney can be reached at (312) 321-4276.

BRINKS HOFER  
GILSON & LIONE  
P.O. Box 10395  
Chicago, IL 60610  
(312) 321-4200

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Peter Nichols', is written over a solid horizontal line.

G. Peter Nichols  
Reg. No. 34,401  
Attorney for Applicant